



McDonald Hopkins LLC
600 Superior Avenue, East
Suite 2100
Cleveland, OH 44114
P 1.216.348.5400
F 1.216.348.5474

Direct Dial: 216.348.5839
E-mail: rblake@mcdonaldhopkins.com

February 10, 2016

By ECF AND EMAIL

Hon. Andrew L. Carter, Jr.
United States District Court
Southern District of New York
40 Foley Square, Room 435
New York, New York 10007

Re: *United States of America v. Edward Durante, et al.*
In The United States District Court Southern District of New York
Case No. S4 15 CR 171 (ALC)

Dear Judge Carter:

On behalf of my client, Larry Werbel, and with the consent of the United States Attorney's Office, I am writing to request an additional one week enlargement of time, from February 10, 2016, until February 17, 2016, to comply with the conditions of bond ordered by this Honorable Court.

On January 13, 2016, the Court ordered Mr. Werbel released pending trial, on the following conditions: that Mr. Werbel sign a personal recognizance bond in the amount of \$500,000, to be co-signed by two financially responsible persons, and secured by \$100,000 in equity and \$10,000 in cash; that he restrict his travel to the Northern District of Ohio, the Eastern and Southern Districts of New York, and the District of New Jersey; that he surrender his travel documents and make no new applications for such documents; and that he submit to regular pretrial supervision. As of February 3, 2016, Mr. Werbel complied with all but one of the conditions by securing only one co-sign on the bond. The Court thereafter provided Mr. Werbel until February 10, 2016, to find a second co-signor.

As of late last week, Mr. Werbel was unable to secure a second co-signor. Counsel for Mr. Werbel advised government counsel of the situation and both parties agreed to ask the Court to lower the bond amount to \$250,000 if Mr. Werbel could secure a co-signor for that amount. As of today, Mr. Werbel has secured a second - and perhaps a third - co-signor to sign on the bond, if the amount is lowered to \$250,000. Both parties are coordinating on the matter and require additional time for the government to interview the additional co-signor(s). Consequently, I respectfully request that your Honor allow one additional week for Mr. Werbel to comply with the conditions of bond. If the new co-signor(s) are accepted by the government, we expect government counsel to request a change in bond condition from \$500,000 to \$250,000.

If Your Honor is inclined to grant this request for additional time, I respectfully ask that you memo endorse this letter below. Please do not hesitate to contact me if you have any questions.

Very truly yours,

A handwritten signature in black ink, appearing to read "Richard H. Blake". The signature is fluid and cursive, with the first name "Richard" and last name "Blake" being clearly legible.

Richard H. Blake

So Ordered: HON. ANDREW L. CARTER, JR.

cc: AUSA Daniel S. Goldman
AUSA Andrea M. Griswold